

# EXHIBIT A

FILED 4TH JUDICIAL DIST.  
2025 APR 21 AM 9:37*Civil*IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MULTNOMAH

25CV24323

Antonio pettyjohn Blue  
Plaintiff

vs.

Delta Air lines, unknown Delta  
security officers Janne Doe  
Defendant 1 & 2

Case No: \_\_\_\_\_

Complaint for Discrimination  
Harassment, and damagesPrayer Amount \$ 300,000Claim (☐ is / ☐ is not) subject to  
mandatory arbitration

Filing Fee Authority \_\_\_\_\_

1. plaintiff Brings this civil rights and personal injury complaint against Delta air lines and two of its unidentified security officers for harassment racial discrimination, and false accusation while passing through Seattle-Tacoma International airport (SEA) on April 15 2025. 2. plaintiff, a humanitarian and public figure, was traveling home after an international tour and charitable work, including efforts with respected families such as The Reduffs. During a routine security passage, plaintiff was wrongfully profiled, falsely accused of making a threat, and publicly humiliated.

3. Despite remaining calm, cooperative, and respectful throughout the encounter, plaintiff was accused of threatening behavior for simply referencing family and community connections in portland. this accusation was baseless, and no threat was made.

4. The incident, which occurred around 5:45 pm, caused emotional distress, public embarrassment, and reputational damages. plaintiff seeks

\$300,000 in damages and a court order requiring Delta Air Lines to release and preserve all surveillance video from the incident.

5. Jurisdiction and venue

This court has jurisdiction under 28 U.S.C. 1331 and 1343 (federal civil rights violations) and 28 U.S.C. 1367 (state law claims).

6. venue is proper in this district under 28 U.S.C. 1391(b), as the events giving rise to the claims occurred within this judicial district.

(Factual Allegations)

10. on April 15, 2025, plaintiff was walking through Delta's baggage area to board a connecting flight at SEA-TAC when approached by "Jane Doe 1" a Delta security officer with a K9 unit.
11. plaintiff cooperated fully, was not confrontational, and remained calm during the interaction. He respectfully spoke about his recent overseas work and referenced known members of the Portland community.
12. Jane Doe 1 left briefly, then returned with Jane Doe 2, who falsely accused plaintiff of making a threat. plaintiff had simply stated something like, I don't want my Portland family to disagree, referencing Governor Goldschmidt's public responsiveness - not a threat of any kind.



13. plaintiff was ~~then~~ taken aside and interrogated further, despite giving no resistance, showing no hostility, and violating no laws or policies.
14. At no point did plaintiff interfere with security operations or obstruct official duties. He acted professionally, but was still publicly humiliated and treated as a threat due to a misunderstanding and profiling.
15. A supervisory officer, who acted appropriately and professionally, ultimately allowed plaintiff to proceed and board his flight. plaintiff explicitly excludes this supervisor from any wrongdoing.
16. The actions of Jane Doe 1 and Jane Doe 2 were unreasonable, unjustified, and discriminatory. plaintiff's dignity and rights were violated.
17. plaintiff is a well respected figure in his community and suffered emotional distress, public humiliation, and reputational damage from false accusation.
- Count 1 - violation of Civil Rights (42 U.S.C. 1983-1981)
- Count 2 - false accusation and defamation
- Count 3 - Intentional infliction of emotional distress
- Count 4 - Racial Discrimination - \$ 300,000 Award - Court order requiring video footage - a finding that delta's improper, mandated training for Delta Security on de-escalation and anti-discrimination

4-21-2025

Dated

Antonio Petty John Blue

Submitted By

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